

## REMARKS

This is intended as a full and complete response to the Office Action dated September 26, 2003, having a shortened statutory period for response set to expire on December 26, 2003. Please reconsider the claims pending in the application for reasons discussed below.

Claims 30-32, 34, 36-39, 42, and 50-53 remain pending in the application and are shown above. Claims 33, 35, 41, and 54-57 have been cancelled by Applicant. Claims 30-32, 34, 36-39, 42, and 50-53 stand rejected. Reconsideration of the rejected claims is requested for reasons presented below.

Claims 30-32, 36, 42, 50, 51, and 53 have been amended to more clearly recite an aspect of the invention. Applicant submits that the changes made herein do not introduce new matter.

Claims 30, 31, and 34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Woodruff, et al.* (U.S. Patent No. 6,497,801) in view of *Ritzdorf, et al.* (U.S. Patent No. 6,545,926). Applicant has amended claim 30 to recite at least one anode segment mounted to at least one anode support mounted on the anode base such that an electrolyte solution channel is defined between the plurality of anode segments and the anode base. Applicant submits that neither *Woodruff, et al.* nor *Ritzdorf, et al.* shows or suggests an electrolyte solution channel defined between a plurality of anode segments and an anode base. *Woodruff, et al.* shows anode segments disposed on a mounting base 140 (which is cited as an anode support by the Examiner) that is connected to an inlet conduit 18 (which is cited as an anode base by the Examiner) such that there is no channel defined between the plurality of anode segments and the inlet conduit. *Ritzdorf, et al.* does not teach or suggest a plurality of anode segments. Thus, *Woodruff, et al.*, alone, or in combination with *Ritzdorf, et al.* does not teach, show, or suggest an electrolytic cell comprising an electrolyte container comprising an anode base, a plurality of concentric anode segments positioned in the electrolyte container, wherein at least one of the plurality of anode segments is mounted to at least one anode support mounted on the anode base such that an electrolyte solution channel is defined between the plurality of anode segments and the anode

base, insulating members positionable between adjacent segments of the plurality of anode segments, and an electrical source coupled to each of the anode segments, as recited in claim 30. Applicant respectfully requests withdrawal of the rejection of claim 30 and of claims 31 and 34, which depend thereon.

Claims 32, 36-39, 42, and 50-53 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Woodruff, et al.* in view of *Ritzdorf, et al.* and *Wang* (U.S. Patent No. 6,391,166). As discussed above, Applicant submits that *Woodruff, et al.* in view of *Ritzdorf, et al.* does not provide all of the limitations of claim 30, upon which claim 32 depends. Applicant further submits that *Wang* does not show or suggest at least one of a plurality of anode segments mounted to at least one anode support mounted on an anode base such that an electrolyte solution channel is defined between the plurality of anode segments and the anode base. *Wang* shows and describes an anode, but does not show or describe an anode support, an anode base, or an electrolyte solution channel defined between a plurality of anode segments and an anode base. Thus, *Woodruff, et al.* in view of *Ritzdorf, et al.* and *Wang* does not provide all of the limitations of claim 32. Applicant respectfully requests withdrawal of the rejection of claim 32.

Applicant submits that claim 36 is patentable over *Woodruff, et al.* in view of *Ritzdorf, et al.* and *Wang* for the reasons discussed above with respect to claim 32, as claim 36 includes an electrolyte solution channel defined between a plurality of anode segments and an anode base. Thus, *Woodruff, et al.* in view of *Ritzdorf, et al.* and *Wang* does not teach, show, or suggest an electrolytic cell comprising an electrolyte container comprising an anode base, an electrolyte solution input port, a plurality of concentric anode segments positioned in the electrolyte container, wherein at least one of the plurality of anode segments is mounted to at least one anode support mounted on the anode base such that an electrolyte solution channel is formed between the plurality of anode segments and the anode base and wherein the anode segments are positioned with spaces therebetween such that electrolyte solution from the electrolyte solution input port can pass from the electrolyte solution channel below the anode segments to above the anode segments through the spaces between the anode segments, and insulating members positioned between adjacent segments of the

plurality of anode segments, as recited in claim 36. Applicant respectfully requests withdrawal of the rejection of claim 36 and of claims 37-39, 42, and 50, which depend thereon.

Regarding claim 51, Applicant submits *Woodruff, et al.* in view of *Ritzdorf, et al.* and *Wang* does not show or suggest a plurality of non-concentric anode segments wherein one of the anode segments is surrounded by another one of the anode segments. *Woodruff, et al.* and *Wang* describe concentric anode segments. *Ritzdorf, et al.* shows an unsegmented anode. Therefore, *Woodruff, et al.* in view of *Ritzdorf, et al.* and *Wang* does not teach, show, or suggest an electrolytic cell comprising an electrolyte container, a plurality of non-concentric anode segments positioned in the electrolyte container, wherein one of the anode segments is surrounded by another one of the anode segments, and an electrical source coupled to each of the anode segments, as recited in claim 51. Applicant respectfully requests withdrawal of the rejection of claim 51 and of claims 52-53, which depend thereon.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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